

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

Raymond A. Claypoole and
Michelle D. Claypoole, Debtors

Bankruptcy No.: 16-22588-JAD
Chapter 13

Raymond A. Claypoole and
Michelle D. Claypoole, Movants

v.

Ronda J. Winnecour, Chapter 13 Trustee, Respondent.

DEBTORS' CERTIFICATION OF DISCHARGE ELIGIBILITY

And now, come the Debtors/Movants Raymond A. Claypoole and Michelle D. Claypoole, by and through their counsel Michael S. Lazaroff, Esquire, and respectfully represent as follows:

1. The Debtors/Movants have made all payments required by the Chapter 13 Plan.
2. The Debtors/Movants are not required to pay any domestic support obligations.
3. The Debtors/Movants are entitled to a discharge under the terms of Section 1328 of the Bankruptcy Code. The Debtors/Movants have not received a prior discharge in a bankruptcy case within the time frames specified in Section 1328(f)(1) of the Bankruptcy Code. Section 1328(h) of the Bankruptcy Code does not render the Debtors/Movants ineligible for a discharge.
4. On October 12, 2020, at docket number 99, Debtor/ Movant Raymond A. Claypoole complied with Federal Rule of Bankruptcy Procedure 1007(c) by filing a *Certification*

About A Financial Management Course, with the requisite *Certificate of Debtor Education* attached.

5. On October 15, 2020, at docket number 100, an Order was docketed granting joint Debtor/Movant Michelle D. Claypoole's Motion for a waiver of the requirement for her to complete and file a Certification About a Financial Management Course.

6. This Certification is being signed under penalty of perjury by undersigned counsel who duly questioned the Debtors/Movants about the statements in this *Certification* and verified the answers in support of this Certification.

Date: August 7, 2021

/s/ Michael S. Lazaroff

Michael S. Lazaroff, Esquire
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